

**ORIGINAL**

Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, D.C. 20554

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In the Matter of )  
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)

Joint Petition to Ensure )  
Interoperability to E 9-1-1 Emergency )  
Calling Systems )

RM-93-43

RM-9343

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FEDERAL COMMUNICATIONS COMMISSION  
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**COMMENTS OF THE  
MULTIMEDIA TELECOMMUNICATIONS ASSOCIATION  
TO JOINT ORIGINAL PETITION**

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September 18, 1998

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To: The Federal Communications Commission

**COMMENTS OF THE  
MULTIMEDIA TELECOMMUNICATIONS ASSOCIATION  
TO JOINT ORIGINAL PETITION**

Pursuant to the Commission's Public Notice, DA 98-1652, released August 18, 1998, the Multi-Media Telecommunications Association ("MMTA") files the following comments on the Joint Original Petition of the Texas Advisory Commission on State Emergency Communications, the Greater Harris County 9-1-1 Emergency Network, Tarrant County 9-1-1, Denton County 9-1-1, Bexar Country 9-1-1, and the National Association of State Nine-One-One Administrators ("Joint Petitioners"). The Joint Petitioners request the Commission to investigate 9-1-1 interoperability issues and any resulting problems caused by a lack of 9-1-1 interoperability.

**STATEMENT OF INTEREST**

MMTA is a national trade association of manufacturers, suppliers, distributors, retailers and users of customer-premises business telecommunications systems. Founded in

1970 as the North American Telephone Association ("NATA"), MMTA acquired its present name in 1995, when it reorganized to reflect a broadened focus on the diversity of technologies and media now available to business telecommunications users. In 1997, MMTA became affiliated with the Telecommunications Industry Association ("TIA"). MMTA exists to promote competitive markets and healthy sales and support channels for users of business communications products and services. An active participant in regulatory proceedings affecting CPE markets, MMTA supports regulatory policies that promote fair competition in the telecommunications equipment and services distribution marketplace. MMTA has actively participated in the "wireline" phase of the FCC's 911 proceeding, CC Docket No. 94-102, and is a party to the consensus agreement filed in that proceeding in April 1997 and awaiting approval by the FCC.

**I. THE PETITION DOES NOT SET FORTH A CONCRETE ISSUE WARRANTING COMMISSION INVESTIGATION**

The Petition expresses general concern about interoperability and makes general reference to certain technical issues. However, it does not describe with specificity any concrete problems involving interoperability. As a result, it is impossible for the Commission or other parties to determine, based on the petition alone, whether any investigation of interoperability is warranted. In general, federal policy favors private sector development of technical standards. In the area of 9-1-1, the industry and the 9-1-1 community have been particularly active in the development of standards. Government action to replace private sector activity with federally imposed regulations that dictate the design of equipment could adversely affect innovation in equipment design. The Commission should require a strong showing that technical problems are having a serious

impact on public safety, as a prerequisite for any attempt to impose technical regulations on the design of telecommunications equipment.

## **II. INTEROPERABILITY CONCERNS ARE DIFFERENT FOR PSAP CPE THAN FOR NON-PSAP CPE**

The petition frequently uses the term “9-1-1 CPE,” without defining the term. As a result, it is not clear whether the interoperability problems perceived by petitioners relate only to interoperability involving telecommunications networks and the customer premises equipment (“CPE”) used in public safety answering points (“PSAP CPE”), or whether the petitioners intend a broader focus that includes other types of CPE, including CPE used by ordinary business and commercial telephone service subscribers. In most cases, non-PSAP CPE is only incidentally used to originate or process 9-1-1 calls. Thus, the most natural reading of the term “9-1-1 CPE” in the context of this petition is that the term is not intended to address non-PSAP CPE. However, on page 8 of the petition, it is suggested that the Commission consider “9-1-1 Compliant” specifications for a variety of equipment, including *both* “PSAP CPE” *and* “PBX switches used in ‘regular’ commercial scenarios,” as well as other types of PBXs that are not used for specialized 9-1-1 purposes.<sup>1</sup> In considering what action, if any, to take on the Petition, the Commission should recognize that there is an important distinction between PSAP CPE and ordinary business CPE, and that substantially different considerations are raised by the prospect of mandating technical standards for the two types of equipment.

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<sup>1</sup> The Petition also mentions “PBX/ACD switches” and “PBX switches used in STS/RMTS scenarios.”

### **A. PSAP CPE**

Because PSAP CPE is on the premises of 9-1-1 agencies such as the petitioners, and is used fulltime in the processing of 9-1-1 calls, petitioners have a clear interest in ensuring that this equipment meets their technical needs. However, MMTA questions whether any unresolved technical issues would justify adoption of new Part 68 requirements governing the design of PSAP CPE. As the purchasers of PSAP CPE, 9-1-1 agencies can individually and collectively ensure that the design of 9-1-1 CPE through the procurement process.

### **B. Other CPE**

With respect to other CPE, such as PBXs used for ordinary business purposes, the Commission should be particularly careful not to impose additional cost burdens on the design of equipment. Ordinary business CPE is used only incidentally for 9-1-1 calls. To the extent that there are issues concerning the processing of calls originating from business CPE, those issues have been the subject of extensive deliberations and a consensus agreement in CC Docket No. 94-102. That consensus agreement specifically limits the applicability of any 9-1-1 requirements to specific types of user environments. Further, the consensus agreement provides for a great deal of flexibility on the part of CPE manufacturers and business users in the technical solutions – including solutions they develop and deploy to meet applicable 9-1-1 performance requirements. Any attempt to impose rigid technical requirements on CPE would be contrary to the spirit of the consensus agreement pending in that Docket.

Moreover, as the Petition acknowledges, there is a good deal of sentiment in the 9-1-1 community that the use of CAMA trunks to convey 9-1-1 location information is not cost-effective, efficient, or appropriate. Petition at 4. Yet, to the extent that specific

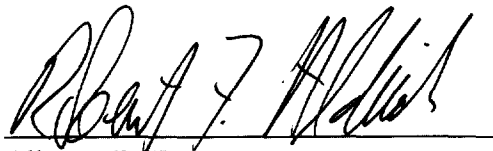
technical requirements for CPE have been proposed in the past, those requirements have involved CAMA trunks. See, e.g., Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems, CC Docket No. 94-102, Notice of Proposed Rulemaking, FCC 94-237, released October 19, 1994, Appx., C., proposed Section 68.320(a). Given the acknowledged deficiencies of CAMA and the high cost of deploying "CAMA-compliant" business CPE, the Commission should be vigilante to prevent adoption of regulations, at either the federal or state level, that would force the CPE industry unnecessarily to deploy costly and inefficient CAMA-compliant CPE. As MMTA has requested in its pending petition for declaratory ruling, filed April 12, 1996, and as provided in the pending consensus agreement in CC Docket No. 94-102, the Commission should ensure that no federal or state 911 regulations impose unnecessarily burdensome CPE requirements, i.e., requirements that exceed the performance requirements set forth in the consensus agreement.

## CONCLUSION

In summary, the Commission should require a more specific description of perceived 9-1-1 interoperability problems before deciding whether an investigation into such problems is warranted. In considering the Petition, the Commission should distinguish between interoperability issues involving PSAP CPE and any alleged interoperability issues concerning ordinary business CPE. In light of the record established in Docket 94-102, there is no basis in the Petition for modifications to existing Part 68 rules governing the design of ordinary business CPE.

Dated: September 18, 1998

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Robert F. Aldrich", is written over a horizontal line.

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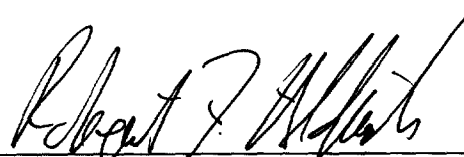
Telecommunications Association

## CERTIFICATE OF SERVICE

I hereby certify that on September 18, 1998, a copy of the foregoing Comments of the MultiMedia Telecommunications Association To Joint Original Petition was delivered by first-class, postage prepaid mail to the following parties:

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